

04 March 2013

Fiona M. Alexander
Associate Administrator, Office of International Affairs
National Telecommunications and Information Administration
1401 Constitution Avenue NW., Room 4701, Washington, DC 20230

Dear Ms Alexander,

Re: .us ccTLD Request for Comments - Docket Number: 130124072-3072-01

ARI Registry Services thanks you for the opportunity to provide input on the following question included in the National Telecommunication and Information Administration (NTIA) .us ccTLD Request for Comments dated 31 January 2013. We would like to provide our input to question 2 of the request:

2. Are there policies and practices developed or employed by other ccTLDs, ccTLD organizations, and the stakeholder community that could be incorporated into the usTLD space to spur innovation, growth, and use of the usTLD or improve the domain name registrant experience? Please be specific in your response.

ARI Registry Services has developed a vast understanding of the parameters relevant in assessing the growth and development of ccTLDs within a competitive market place.

We note that the average annual growth rate of 6% experienced by the .us ccTLD is, based on ARI Registry Services experience, comparatively low taking into account the potential of the market.

In an effort to address this low average annual growth rate and taking into account the various factors associated with the .us ccTLD, ARI Registry Services can point toward the adoption of a number of practices employed by other ccTLDs to spur innovation, and growth while improving the domain name registrant experience. These practices focus on the establishment of strong product foundations underpinned by policy regimes and marketing activities that are aimed at positioning the .us ccTLD as a national resource and trusted brand for the people of the United States.

ARI Registry Services firmly believe that the time is now to re-establish the .us ccTLD as the asset that it should be. We believe that the .us ccTLD should be positioned as a namespace with an identity which is distinctly different from the other available TLD products.

By adopting this approach, the .us ccTLD will not be competing with other namespaces; rather it will deliver its own unique set of values and benefits to all of its users.

We believe that the .us ccTLD should be the choice for domain name registrants wanting to promote themselves within the United States, and for end users to have certainty in the knowledge that they are dealing with an entity operating in a regulated and transparent environment.

We are confident that with adjustments to the .us ccTLD policy and brand messaging that these goals can be achieved and resultant growth will follow.

ARI Registry services are strong supporters of the multi stakeholder model and strongly advocate this in the continual evolution of policy in relation to a ccTLD. The .us ccTLD manager has certain unique responsibilities to serve the people of the United States, and these must be respected. As the internet is an ever evolving landscape, and one that changes quickly, to ensure that the .us ccTLD remains relevant, consultation, review and development must remain a constant theme.

A high level summary of activities that may be considered is as follows:

- The establishment of core product differentiators, driven by the .us ccTLD policy framework
- Marketing and research programs to increase brand awareness and support product value propositions
- Use of advisory panels, committees and other consultative groups to assist in the development and review of policies and practices that are appropriate and responsive to the needs of the market
- Securing high profile domain name registrants to increase awareness and generate national pride
- Mainstream marketing and public relations activities to highlight the benefits of the .us ccTLD

In summary we believe that there is opportunity for the .us ccTLD to grow and thrive on its own merits and service the people of the United States in a way that is not currently being realised.

We thank you for the opportunity to provide comment.

Sincerely,



Adrian Kinderis
Chief Executive Officer
ARI Registry Services